

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

In re:

RMS TITANIC, INC., *et al.*,

Debtors.¹

Case No.: 3:16-bk-02230-PMG

Chapter 11

(Jointly Administered)

**NOTICE OF DEPOSITION OF CORPORATE REPRESENTATIVE
OF GLASSRATNER ADVISORY & CAPITAL GROUP LLC**

PLEASE TAKE NOTICE that at **12:00 p.m. on Friday, August 24, 2018**, counsel for Official Committee of Equity Security Holders of Premier Exhibitions, Inc., Chapter 11 Debtor in Case No. 3:16-bk-02232-PMG and the parent company of RMS Titanic, Inc., the Chapter 11 Debtor in Case No. 3:16-bk-02230-PMG will take the testimony by deposition upon oral examination of GlassRatner Advisory & Capital Group LLC ("GlassRatner") at the offices of GlassRatner, 3445 Peachtree Rd NE, Unit 1225, Atlanta, Georgia 30326, pursuant to Rule 30 of the Federal Rules of Civil Procedure, made applicable by Rule 7030 of the Federal Rules of Bankruptcy Procedure.

The deposition will take place before an officer authorized by law to administer oaths for the purposes of discovery, for use as evidence at any hearing or trial and for any other purposes allowed under Federal Rules of Civil Procedure and Federal Rules of Bankruptcy Procedure. The deposition will be recorded by stenographic means.

¹ The Debtors in the chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: RMS Titanic, Inc. (3162); Premier Exhibitions, Inc. (4922); Premier Exhibitions Management, LLC (3101); Arts and Exhibitions International, LLC (3101); Premier Exhibitions International, LLC (5075); Premier Exhibitions NYC, Inc. (9246); Premier Merchandising, LLC (3867); and Dinosaurs Unearthed Corp. (7309) (collectively, the "Debtors"). The Debtors' service address is 3045 Kingston Court, Suite I, Peachtree Corners, Georgia 30071.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), as made applicable to this matter by Federal Rules of Bankruptcy Procedure 7030, GlassRatner shall designate one or more officers, directors, managing agents or other persons to appear and testify on its behalf concerning the matters set forth below. The individual(s) designated shall testify to matters known or available to GlassRatner.

TOPICS FOR RULE 30(b)(6) DEPOSITION

1. All documents produced by GlassRatner Advisory & Capital Group LLC in response to the Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Bankruptcy Case issued by the Official Committee of Equity Security Holders.
2. The Asset Purchase Agreement, including among other things, the proposed Bidding Procedures Order, the Bid Procedures, and other Bid Protections (collectively, the "Sale Procedures") set forth therein and attached as exhibits to the Motion for Approval of (a) Competitive Bidding and Sale Procedures; (b) Form and Manner of Notices; (c) Form of Asset Purchase Agreement; (d) Break Up-Fee and Expense Reimbursement; (e) Scheduling Auction and Hearing to Consider Final Approval of Sale, Including Rejection or Assumption and Assignment of Related Executory Contracts and Unexpired Leases; (f) Authorizing Sale of the Transferred Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests; (g) Settlement with PacBridge Parties; and (h) Granting Related Relief (Doc. 1055) filed by Debtor RMS Titanic, Inc. (the "Sale Motion").
3. Negotiations and other communications that led to the Asset Purchase Agreement and the Sale Procedures set forth in the Sale Motion and other related matters.
4. Negotiations and other communications with Gilbert Li and other Alta Fundamental Advisers LLC representatives and agents related to the Asset Purchase Agreement and the Sale Procedures set forth in the Sale Motion and other related matters.
5. Negotiations and other communications with Giovanni Wong and other PacBridge (Capital Partners (HK) Ltd) representatives and agents related to the Asset Purchase Agreement and the Sale Procedures set forth in the Sale Motion and other related matters.
6. Negotiations and other communications with Bill Schwartz and other Apollo Global Management, LLC representatives and agents related to the Asset Purchase Agreement and the Sale Procedures set forth in the Sale Motion and other related matters.

Date: August 15, 2018

By: /s/ Peter J. Gurfein
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Attorneys for the Official Committee of Equity
Security Holders of Premier Exhibitions, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 15, 2018, the foregoing was transmitted to the Court for uploading to the Case Management/Electronic Case Files ("CM/ECF") System, which will send a notice of electronic filing to all creditors and parties in interest who have consented to receiving electronic notifications in this case. In accordance with the Court's Order Granting Debtors' Motion for an Order Pursuant to 11 U.S.C. § 105(a) and Rule 2002 Establishing Notice Procedures (Doc. 140), a copy of the foregoing was also furnished on August 15, 2018 by U.S. mail, postage prepaid and properly addressed, to the Master Service List attached hereto.

/s/ Jacob A. Brown
Attorney

MASTER SERVICE LIST
Case No. 3:16-bk-02230-PMG

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2482 197th Avenue
Manchester, IA 52057

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Montreal, QC H3C 5H1

ATS, Inc.
1900 W. Anaheim Street
Long Beach, CA 90813

Broadway Video
30 Rockefeller Plaza
54th Floor
New York, NY 10112

CBS Outdoor/Outfront Media
185 US Highway 48
Fairfield, NJ 07004

Dentons Canada LLP
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Vancouver, BC V6C 3R8

Enterprise Rent-A-Car Canada
709 Miner Avenue
Scarborough, ON M1B 6B6

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10190 Covington Cross Drive
Las Vegas, NV 89144

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509 Heron Drive
Swedesboro, NJ 08085

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Rockville, MD 20850

National Geographic Society
1145 - 17th Avenue NW
Washington, DC 20036

NYC Dept. of Finance
PO Box 3646
New York, NY 10008

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19-20 Connaught Road
Central Hong Kong

Pallet Rack Surplus, Inc.
1981 Old Covington Cross Road NE
Conyers, GA 30013

Ramparts, Inc.
d/b/a Luxor Hotel and Casino
3900 Las Vegas Blvd. South
Las Vegas, NV 89119

Screen Actors Guild
1900 Broadway
5th Floor
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